

1 Ramon Rossi Lopez - rlopez@lopezmchugh.com
2 (California Bar Number 86361; admitted *pro hac vice*)
3 Lopez McHugh LLP
4 100 Bayview Circle, Suite 5600
5 Newport Beach, California 92660
6 949-812-5771

7 Mark S. O'Connor (011029) – moconnor@beusgilbert.com
8 BEUS GILBERT, PLLC
9 701 N.44th St.
10 Phoenix AZ 85008
11 480-429-3019
12 *Co-Lead/Liaison Counsel for Plaintiffs*

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

17 No. MD-15-02641-PHX-DGC

18 **PLAINTIFFS' NOTICE OF LODGING
19 DOCUMENT UNDER SEAL
20 REGARDING PLAINTIFFS' TRIAL
21 BRIEF ON THIRD PARTY FAULT**

22 Pursuant to LRCiv 5.6(d), Plaintiffs submit this Notice of Lodging Document
23 Under Seal regarding Plaintiffs' Response to Defendants' Trial Brief on Third Party Fault.

24 Plaintiffs provide notice that, pursuant to LRCiv 5.6(d), they have lodged with the
25 Court the document listed on Exhibit A to this Notice.

26 Defendants contend that the document listed in Exhibit A is confidential and
27 should be filed under seal. As required under LRCiv 5.6(d), Plaintiffs certify that on April
28 23, 2019, the parties met and conferred in good faith and were unable to agree about
whether the document is confidential under the Protective Order and should be filed under
seal. Plaintiffs do not believe that the disputed document warrants continued confidential
treatment as proprietary or sensitive trade secret information.

29 This dispute notwithstanding, the parties have agreed to continue to meet and
30 confer on the document at issue.

1 RESPECTFULLY SUBMITTED this 25th day of April 2019.

2 BEUS GILBERT, PLLC

3 By:s/ Mark S. O'Connor

4 Mark S. O'Connor (011029)
701 N.44th St.
5 Phoenix AZ 85008

6 LOPEZ McHUGH LLP
7 Ramon Rossi Lopez (CA Bar No. 86361)
8 (admitted *pro hac vice*)
9 100 Bayview Circle, Suite 5600
10 Newport Beach, California 92660

11 *Co-Lead/Liaison Counsel for Plaintiffs*

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Jessica Gallentine

EXHIBIT A

Ex. C, Trial Ex. 908, 5/11/2005 Dear Colleague Letter, to Plaintiffs' Response to Defendants' Trial Brief on Third Party Fault.